

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MARCUS HUNT,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:20-cv-1233-RWS
)	
STEVEN OGUNJOBI, et al.,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING PLAN

In accordance with the Court's Order of October 5, 2020 setting a Rule 16 conference in the above-styled matter, the parties submit their Joint Proposed Scheduling Plan as follows:

- (a) The parties agree that a Track 2 designation is appropriate.
- (b) The parties propose that joinder of additional parties or amendment of pleadings take place by **February 12, 2021**.
- (c) Discovery plan:
 - (i) The parties agree that electronically stored information is to be produced in its native electronic format together with all metadata and other information associated with each document in its native electronic format, and in accordance with Federal Rules of Civil Procedure 34(b)(2)(E), unless otherwise agreed to by the parties in writing.
 - (ii) The parties do not believe an agreement of claims of privilege or protection as trial-preparation material after production is necessary under Rule 26(f)(3)(D) and Fed. R. Evid. 502.
 - (iii) The parties shall make their initial disclosures and exchange documents pursuant to Rule 26(a)(1) on or before **December 4, 2020**.

(iv) Discovery need not be conducted in phases or limited to certain issues.

(v) Plaintiff shall disclose any expert witnesses and the required reports by **April 5, 2021** and produce experts for deposition no later than **May 4, 2021**. Defendant shall disclose any expert witnesses and the required reports **June 4, 2021** and produce experts for deposition no later than **July 6, 2021**. Any rebuttal experts and required reports must be disclosed by **August 1, 2021** and produced for deposition no later than **September 1, 2021**.

(vi) The presumptive limits of ten (10) depositions per side and twenty-five (25) interrogatories per party should apply in this case.

(vii) The parties do not anticipate requesting any physical or mental examinations of parties under Rule 35.

(viii) All discovery will be completed by **September 10, 2021**.

(ix) any other matters pertinent to the completion of discovery in this case,

(d) The parties consent to mediation and agree that referral to mediation would be most productive after **September 10, 2021** and at least a month before any dispositive motions deadline.

(e) All dispositive motions shall be filed by **October 10, 2021**. Opposition briefs are due by **November 10, 2021**. Reply briefs are due by **November 30, 2021**.

(f) The parties ask for the first available trial date and believes the case would be ready for trial in **March 2022**.

(g) The parties estimate it will take 2-3 days to try this case.

(h) At this time, the parties do not deem any other matters appropriate for inclusion in the Joint Proposed Scheduling Plan.

DATED: November 5, 2020

Respectfully submitted,

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Respectfully Submitted,

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